

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)
)
Deborah Lynn Morris Heacock) Case No. 14-41359-399
) Chapter 13
Debtor.

**DEBTORS' OBJECTION TO CLAIM 12-1 FILED BY
CITIMORTGAGE, INC.**

Comes now Kimber H. Baro, Attorney for Debtor, and for her objection to claim states as follows:

The secured claim 12-1 filed by CitiMortgage, Inc.. in the sum of \$116,239.18 should be allowed as filed but no payments made by the Trustee because the debtor is surrendering the real estate at 12303 Benham Road, St. Louis, MO 63138. An amended claim may be filed for any deficiency balance after foreclosure.

WHEREFORE, Debtor prays the Court will enter its order sustaining this objection.

NOTICE OF FILING OF OBJECTION TO CLAIM

PLEASE TAKE NOTICE that the Debtor has filed an objection to your claim. Any responsive pleading in opposition to the above objection must be filed in writing with the Clerk of the United States Bankruptcy Court, 111 South 10th Street, 4th Floor, St. Louis, Missouri 63102, and with the Chapter 13 Trustee at the address indicated below, within 21 days of the date of this Notice. If no responsive pleading is filed, the objection may be sustained and the claim disallowed or modified without further notice to any party upon submission of an order from the Debtor. If a response is filed, this matter will be set for hearing upon subsequent notice.

The undersigned hereby certifies that a copy of the foregoing was served upon the following parties by either electronic mail through the Court's ECF system or by regular mail on June 26, 2014.

Bublitz & Baro, LLC

/s/Kimber H. Baro 33690MO

Attorney for Debtor

1113 Howdershell Road

Florissant, MO 63031

Tel: (314) 831-2277

Fax: (314) 831-2344

Email: kbaro@bublitzandbaro.com

John V. LaBarge, Jr.

Chapter 13 Trustee

P.O. Box 430908

St. Louis, MO 63143

CitiMortgage, Inc.

P.O. Box 6030

Sioux Falls, SD 57117-6030

/s/ Kimber H. Baro